Exxon Mobil Corporation 2001 Pennsylvania Avenue, N.W. Suite 300 Washington, D.C. 20006

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EXonMobil

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PUBLIC DOCUMENT

The Honorable Donald L. Evans Secretary of Commerce U.S. Department of Commerce International Trade Administration Central Records Unit, Room 1870 14th and Constitution Avenue, N.W. Washington, D.C. 20230

Attn: Albert Hsu and George Smolik

Re: Comments on the Requests for Market Economy Status for the

Republic of Kazakhstan--Antidumping Duty Investigation of

Silicomanganese From Kazakhstan (A-834-807)

Dear Secretary Evans:

On behalf of Exxon Mobil Corporation, we are submitting the following in response to the Notice published in the Federal Register on November 9, 2001 inviting comments on Kazakhstan's non-market economy ("NME") status. Based on the experience of ExxonMobil subsidiaries in Kazakhstan (references to "ExxonMobil" hereinafter are to subsidiaries of the Exxon Mobil Corporation that carry on business in Kazakhstan), and for the business reasons discussed more fully below, ExxonMobil supports the requests by the Government of Kazakhstan and Kazchrome for revocation of Kazakhstan's NME status under section 771(18) of the Tariff Act of 1930, as amended ("the Act").

ExxonMobil's experiences in Kazakhstan indicate that the Government and country have made great strides toward economic stability and establishing the conditions of a market economy during the ten years since independence. In our view, Kazakhstan's market-based transition during that period, and in particular during the last few years, clearly supports the revocation of the classification of Kazakhstan as a non-market economy country.

The overall business climate in Kazakhstan in recent years has been conducive to foreign investment and as a result ExxonMobil's net investments in the country have been significant

In evaluating the Kazakhstan marketplace, you may find the following comments related to our experiences to be of particular interest:

- Our experience with Kazakhstan's currency indicates that Kazakhstan's currency, the
 tenge, is fully convertible. ExxonMobil subsidiaries have been able to open and
 maintain accounts in foreign currency and to engage in currency exchanges at
 accessible banks, including those with foreign ownership, and institutions. The
 exchange rate for the tenge has been fairly stable in recent years.
- In the employment area, ExxonMobil subsidiaries have been able to hire many competent employees from the local workforce in Kazakhstan. We have found these individuals to be well-educated, and capable of being trained to handle work assignments of increasing levels of responsibility.
- Goods and services are secured by arms-length, transparent bidding processes and negotiations based on market conditions. At our initiative, contracts include an assessment of local content to foster ongoing cost reductions and increased availability of more efficient suppliers and competitive domestic supplies.
- We are unaware of any constraints on private companies regarding production levels. The government has the contractual right to take production-in-kind at world market prices in lieu of royalty or profit share, and discussions on this topic have been underway with no indication of undue pressure on price or production controls.
- The recent startup of CPC pipeline opening new route for crude oil export at lower costs and improved quality bank revenues even though results in lower tariffs available for state-owned alternative routes (rail, barge, domestic pipelines).
- We continue to freely export oil production at world market prices without governmental constraint.

As with any country achieving the status and financial stability to attract major foreign investments, ongoing improvements in understanding the impacts of potential new legislation and regulations on existing agreements are important. ExxonMobil, both directly and through operators of the assets in which ExxonMobil holds interests, continues to maintain a productive dialogue and working relationship with the appropriate governmental agencies responsible for regulatory oversight of the company's assets to resolve any issues which arise relating to the interpretation and the rights of foreign investors like ExxonMobil under these agreements.

In summary, ExxonMobil believes that Kazakhstan has made significant strides toward establishing a fiscal and regulatory system conducive to foreign investment and supports the requests by the Government of Kazakhstan and Kazchrome for revocation of Kazakhstan's NME status under section 771(18) of the Tariff Act of 1930, as amended ("the Act").

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This document has been served in accordance with the attached certificate of service. Please do not hesitate to contact me should you have any questions.

Respectfully Submitted,

cc:

Jean Kemp Cheryl Werner Brandon Farlander

SILICOMANGANESE FROM KAZAKHSTAN

A-834-807

PUBLIC CERTIFICATE OF SERVICE

I, James J. Rouse hereby certify that a copy of the attached submission was served on this 10th day of December, 2001, by first class mail on the following parties:

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Mr. William D. Kramer, Esq. VERNER LIIPFERT BERNHARD MCPHERSON AND HAND 901 15th Street, N.W. Washington, D.C. 20005

James J. Rouse